

CORRES. CONTROL
OUTGOING LTR NO.

EG&G ROCKY FLATS

DOE ORDER# 4700.1
94 RF07482

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

| DIST. | LTR | ENC |
|------------------|-----|-----|
| AMARAL, M.E. | | |
| BURLINGAME, A.H. | | |
| BUSBY, W.S. | | |
| BRANCH, D.B. | | |
| CARNIVAL, G.J. | | |
| DAVIS, J.G. | | |
| FERRERA, D.W. | | |
| FRAY, R.E. | | |
| GEIS, J.A. | | |
| GLOVER, W.S. | | |
| GOLAN, P.M. | | |
| HANNI, B.J. | | |
| HARMAN, L.K. | | |
| HEALY, T.J. | | |
| HEDAH, T. | | |
| HILBIG, J.G. | | |
| HUTCHINS, N.M. | | |
| JACKSON, D.T. | | |
| KELL, R.E. | | |
| KUESTER, A.W. | | |
| MARX, G.E. | | |
| McDONALD, M.M. | | |
| McKENNA, F.G. | | |
| MONTROSE, J.K. | | |
| MORGAN, R.V. | | |
| POTTER, G.L. | X | |
| PIZZUTO, V.M. | | |
| RISING, T.L. | | |
| SANDLIN, N.B. | | |
| SCHWARTZ, J.K. | | |
| SETLOCK, G.H. | | |
| STEWART, D.L. | | |
| STIGER, S.G. | X | |
| TOBIN, P.M. | | |
| VOORHEIS, G.M. | | |
| WILSON, J.M. | | |
| Dyer E | X | |
| Leahy A | X | |
| Mullen J | X | |
| London K | X | |
| Quinn L | X | |
| Looke S | X | |
| File | X | |
| CORRES. CONTROL | X | X |
| ADMN RECORD/080 | X | |
| TRAFFIC | | |
| PATS/T130G | | |

| | |
|-----------------|--|
| CLASSIFICATION: | |
| UCNI | |
| UNCLASSIFIED | |
| CONFIDENTIAL | |
| SECRET | |

AUTHORIZED CLASSIFIER
SIGNATURE
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE
DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS
☐ PARTIAL/OPEN
☐ CLOSED
LTR APPROVALS:
ORIG & TYPIST INITIALS
SRK 116

July 14, 1994

94-RF-07482

F. R. Lockhart
Environmental Restoration Division
DOE, RFFO

SUSPENSION OF C-POND SLUDGE REMOVAL OPERATIONS SRK-150-94

Action: None required

This letter documents our plans in response to the Colorado Department of Health (CDH) rejection of the existing sludge characterization for Solar Evaporation Pond 207 C and the Unit 48 Clarifier. To summarize the status: a change to interim status is a necessary precursor to moving the C-Pond and Clarifier sludges to tank storage on the 750 Pad, Unit 25. Solar Pond Projects (SPP) has had repeated interactions with the CDH permitting staff to present our data and provide other information requested by CDH. SPP feels it is imprudent to proceed with the sludge storage with an unresolved issue of the magnitude of waste characterization as a condition to the interim status approval. On July 8, CDH informed us via a phone call that they have rejected the site's position and are further considering issuance of a Notice of Violation over the issue. Given the long history of this issue and the extreme position apparently taken by CDH, SPP must conclude that no resolution is likely in the near future.

SPP expects salt milling of C Pond to be complete this week. As of the close of business Friday, SPP will release the truck operators: the cost of approximately 85 dollars per hour for each of three operators for an indefinite period seems like an unacceptable expenditure of funds. SPP will retain the trucks on site, and pay the related fee. Since the trucks cannot be released without a costly decontamination effort, their retention seems appropriate at this time. SPP will evaluate the costs to release versus retain the trucks. This evaluation will help determine when the trucks should be released.

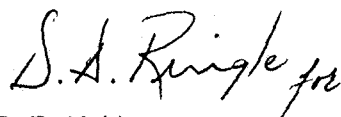
RFFO should be aware of the risks assumed by the release of the truck drivers. The time to remobilize the truck operators cannot be easily predicted, since it depends on vendor workloads outside our knowledge. It is also possible that our trained operators will not be available when operations resume, and that resulting extra training costs and schedule slippage will be incurred. SPP cannot provide RFFO with a schedule for the emptying and cleaning of C Pond given the current situation. Despite these risks, SPP feels suspension of the operators is a prudent management of RFFO's funds.

Although the IAG commitment milestone is January 20, 1995, SPP is very concerned that late fall and winter weather will prove incompatible with C Pond operations: our experience with B Pond and our knowledge of the differences between B and C Ponds forms the basis for this concern. Unless the impasse with the CDH is resolved by August, the IAG milestone will be in jeopardy; a project that was running five months ahead of schedule may be in danger of missing the commitment. Emptying of the pond also is a precursor to completion of the Operable Unit 4 RFI/RI, and the start of construction could be impacted if the delay continues long enough. Although the first of these milestones is six months in the future, please recall that RFFO requested this change to interim status over eight months ago.

ADMIN RECORD

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SPP continues to concur with RFFO's position that general waste analysis for the sludge (6 CCR 1007-3 Part 265.13(a)(1)) has been completed: this position is reasonable, defensible, and proper. SPP has addressed all the tank material compatibility issues that have been raised informally by CDH. RFFO and contracted staffs have worked diligently with EG&G on the interim status issue and the lack of resolution is frustrating. SPP stands ready to assist RFFO in identifying and responding to CDH's current concerns. Please contact myself or Joe Mellen, extension 8607, for further discussion.



S. R. Keith
Program Manager
Solar Pond Projects
EG&G Rocky Flats, Inc.

KCL:jlb

Orig. and 1 cc - F. R. Lockhart

cc:
S. Howard - DOE, RFFO
M. Witherill - DOE, RFFO